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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA**

NORTHERN ALASKA
ENVIRONMENTAL CENTER, *et al.*,

Plaintiffs,

v.

DEBRA HAALAND, in her official
capacity, *et al.*,

Defendants,

and

AMBLER METALS, LLC, *et al.*,

Intervenor-Defendants.

Case No. 3:20-cv-00187-SLG

**STIPULATION AND ADDITIONAL NOTICE
REGARDING THE ADMINISTRATIVE RECORD**

Plaintiffs and Defendants, through undersigned counsel of record, hereby stipulate and agree that certain materials filed as exhibits hereto may be cited as information contained within the administrative records in this case challenging the Ambler Road Project. These materials were included as exhibits to comments submitted during public review of the Project. As such, they constitute “documents and materials directly or indirectly considered by agency decision-makers” during the Project. *See Thompson v. U.S. Dep’t of Labor*, 885 F.2d 551, 555 (9th Cir. 1989). While other contemporaneously-submitted exhibits to the same comments were previously included in the administrative records filed in this case, the exhibits hereto were inadvertently omitted. Specifically, the materials consist of the Red Dog Mine Extension Supplemental Environmental Impact Statement (October 2009), the Greater Mooses Tooth One Development Project Supplemental Environmental Impact Statement (October 2014), and the Greater Mooses Tooth Two Development Project Supplemental Environmental Impact Statement (August 2018). The Bates numbers for these additional administrative records are described in the Table of Exhibits filed herewith. Defendants hereby provide the parties of record with notice of inclusion of these materials in the administrative records, and service of the materials through the Court’s CM/ECF system.

DATED: September 15, 2021.

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CERTIFICATE OF SERVICE

I hereby certify that on September 15, 2021, a copy of the foregoing was served by electronic means on all counsel of record by the Court's CM/ECF system.

/s/ Paul A. Turcke
Paul A. Turcke